



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463 June 16, 2004

RQ-2

Robert E. Gleason, Treasurer  
International Longshoremen's Association AFL-CIO  
Committee on Political Education ILA-COPE  
17 Battery Place  
New York, NY 10004

Response Due Date:  
July 16, 2004

Identification Number: C00158576

Reference: Amended Year-End Report (7/1/03-12/31/03), received 4/23/04

Dear Mr. Gleason:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **An adequate response must be received at the Commission by the response date noted above.** An itemization of the information needed follows:

-Your report(s) was not signed by the treasurer or designated agent listed on your Statement of Organization. Please amend your report(s) by providing the signature of an individual that is authorized to sign the report(s). 2 U.S.C. §434(a)(1) and 11 CFR §104.14(a) and (d) If a new treasurer has been appointed, please file an amended Statement of Organization (FORM 1) or a letter (if not an electronic filer) to reflect this change.

-Schedule B of your report (see attached) discloses one or more contributions which appear to exceed the limits set forth in the Act. 2 U.S.C. §441a(a) prohibits a multicandidate committee and its affiliates from making a contribution to a candidate for federal office in excess of \$5,000 per election.

If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

If any contribution you made exceeds the limits, you must request a refund of the excessive amount or provide a written authorization for a

INTERNATIONAL LONGSHOREMAN'S ASSOCIATION AFL-CIO COMMITTEE ON POLITICAL  
EDUCATION ILA-COPE  
PAGE 2

redesignation of the contribution pursuant to 11 CFR §110.2(b) within 60 days of the treasurer's receipt.

If the foregoing conditions for redesignations were not met within 60 days of the treasurer's receipt, your committee must obtain a refund of the excessive amount.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund or redesignation request sent to the recipient committee(s). In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received. Any redesignations should be disclosed as memo entries on Schedule B supporting Line 23 of the report covering the period during which the redesignation is made. 11 CFR §110.1(b)

Although the Commission may take further legal action regarding the excessive contribution(s), your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

-Schedule B of your report (see attached) discloses one or more contributions which appear to exceed the limits set forth in the Act. 2 U.S.C. §441a(a) prohibits a committee from making contributions to another political committee and its affiliates in excess of \$5,000 per calendar year.

If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

If you have made an excessive contribution, you must notify the recipient and request a refund of the amount in excess of \$5,000. The refund of the excessive amount must be made within sixty (60) days of receipt of the contribution.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund request sent to the recipient committee(s). In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received.

INTERNATIONAL LONGSHOREMAN'S ASSOCIATION AFL-CIO COMMITTEE ON POLITICAL  
EDUCATION ILA-COPE  
PAGE 3

Although the Commission may take further legal action regarding the excessive contribution(s), your prompt action in obtaining a refund will be taken into consideration.

-Schedule A of your report (pertinent portions attached) discloses one or more contributions which appear to be from a financial institution. You are advised that a contribution from a national bank is prohibited by the Act, unless made from a separated segregated fund established by the national bank. 2 U.S.C §441b(a)

If any apparently prohibited contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

If you have received a prohibited contribution(s), you may have to make a refund. If within 30 days of receipt you (1) transferred the prohibited amount to an account not used to influence federal elections, and (2) provided written notice to the person making the contribution of the option of receiving a refund, you may retain the contribution in an account not used to influence federal elections. Any request from a donor for a refund must be honored.

If the foregoing conditions for transfers to a non-federal account were not met within 30 days of receipt, the prohibited amount must be refunded. See 11 CFR 103.3(b)(1).

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for any transfer-out or refund. In addition, any transfers-out or refunds should be disclosed on Schedule B supporting Line 22 or 28 of the report covering the period during which the transaction was made.

Although the Commission may take further legal action concerning the acceptance of a prohibited contribution, prompt action by your committee to transfer-out or refund the amount will be taken into consideration.

-The totals listed on Lines 7, 23, 31, and 32, Column B of the Summary and Detailed Summary Page(s) appear to be incorrect. Please be advised that you should add the "Calendar Year-to-Date" total from your previous report to the current "Total This Period" figure from Column A to derive the correct Column B totals. Please amend your report and any subsequent reports that may be affected by this correction.

INTERNATIONAL LONGSHOREMAN'S ASSOCIATION AFL-CIO COMMITTEE ON POLITICAL  
EDUCATION ILA-COPE  
PAGE 4

-Your calculations for Line 8 appear to be incorrect. Cash-on-hand at the close of the current reporting period should always equal the closing calendar year-to-date cash-on-hand amount. Please provide the corrected total on the Summary Page.

-Line 11(a)(ii) of the Detailed Summary Page discloses \$301,345.64 in unitemized receipts from individuals/persons other than political committees during the reporting period. Please clarify whether this figure includes any receipts from a single source that aggregate greater than \$200 in the calendar year. If this is the case, please amend your report(s) by itemizing the receipts on Schedule A supporting Line 11(a)(i). 2 U.S.C. §434(b)(2)(A) and (3)(A)

-Please amend Schedule B supporting Line 23 by providing the office sought, state, and district for each contribution made to federal candidates. 11 CFR §104.3(b)(3)(ii) and (v)

-Schedule A supporting Line 11(a)(i) of your report discloses memo entries totaling \$301,345.65 from "Citibank" with a description of "unitemized of \$200 or less in agg." Please be advised that 11 CFR §104.3(a)(2)(i)(B) requires a committee to report the total amount of unitemized contributions on Line 11(a)(ii) of the Detailed Summary Page. However, Schedule A for Line 11(a)(i) is used to disclose the identification of each contributor, including an adequate occupation and name of employer for each person that has contributed in excess of \$200 in the aggregate during the calendar year. Please clarify your reporting methods for the public record and amend your report as appropriate.

-Schedule B supporting Line 23 of your report discloses a contribution(s) to "Political Action Committee." Please clarify whether this is a federal committee(s), as there does not appear to be a committee(s) registered with the Commission under this name(s). In the event this is a non-federal committee(s), please disclose it on Schedule B supporting Line 29 of the Detailed Summary Page.

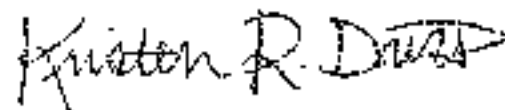
Unlike previous election cycles, you will not receive an additional notice from the Commission on this matter. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. Requests for extensions of time in which to respond will not be considered. Failure to provide an adequate response by this date may result in an audit of the committee. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the

INTERNATIONAL LONGSHOREMAN'S ASSOCIATION AFL-CIO COMMITTEE ON POLITICAL  
EDUCATION ILA-COPE  
PAGE 5

public record and will be considered by the Commission prior to taking enforcement action.

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division) or my local number (202) 694-1152.

Sincerely,



Kristen Davis  
Campaign Finance Analyst  
Reports Analysis Division

INTERNATIONAL LONGSHOREMAN'S ASSOCIATION AFL-CIO COMMITTEE ON POLITICAL  
EDUCATION ILA-COPE  
PAGE 6

Excessive Contribution to a Committee/Candidate

Recipient Name	Date	Amount	Election	Report
Lone Star Fund	3/11/03	\$2,500.00	-	2003 Mid-Year Report
Lone Star Fund	9/25/03	\$2,500.00	-	2003 Year-End Report
Lone Star Fund	9/25/03	\$2,500.00	-	2003 Year-End Report

Friends of Byron Dorgan	6/7/01	\$3,000.00	*Primary	2001 Mid-Year Report
Friends of Byron Dorgan	10/30/03	\$2,500.00	*P2003	2003 Year-End Report
Friends of Byron Dorgan	11/25/03	\$2,000.00	*P2003	2003 Year-End Report

Friends of Jim Clyburn	6/24/03	\$5,000.00	P2004	2003 Mid-Year Report
Friends of Jim Clyburn	10/16/03	\$5,000.00	*P2003	2003 Year-end Report

Prohibited Receipts from a Financial Institution

Contributor Name	Date	Amount
Prudential	09/01/03	\$10,414.44
Prudential	08/01/03	\$11,158.12
Prudential	10/01/03	\$13,081.25
Prudential	11/01/03	\$14,771.79
Prudential	07/01/03	\$15,462.50

\* Schedule B of your report discloses this contribution as designated to the 2003 Primary election, however, this candidate did not participate in a Primary election in 2003. Therefore, this contribution has been attributed to the next scheduled Federal election for this candidate, the 2004 Primary.

